

MEMO ENDORSED

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August 28, 2008

BY FAX: (212)805-7949
Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2260
New York, New York 10007

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: <u>8/28/08</u>

Re: Morel v. Mukasey
08-CV-6498 (PKC) (SDNY)

Dear Judge Castel:

I am in receipt of a communication sent to you via fax by AUSA Natasha Oeltjen, which communication was dated August 27, 2008. The government requests a one-week extension of the deadline when the government should have provided a chronology setting forth the whereabouts of my client, Juan Carlos Morel, from July 14, 2008 when he was apprehended by ICE until July 23, 2008 when he was placed on an airplane to the Dominican Republic.

It is only fair if a one-week extension were to be granted the government in order to file a "letter-brief addressing the jurisdictional issues..." as the government's letter of August 27, 2008 indicates, that an additional one-week extension should be granted the Petitioner in order to review the additional materials regarding jurisdictional issues which the government claims it will file, and respond adequately to said materials.

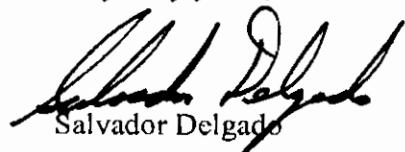
{ The petitioner respectfully requests until September 12, 2008 to submit its response to the government's submission. Given the fact that the caselaw in this area is unsettled, an

*Appeal granted -
S.D.O'D. 8/28/08
JULY 28 2008*

extension of time is necessary in order to respond adequately to any new materials which the government will be submitting.

Thank you for your time and attention to this matter.

Very truly yours,



A handwritten signature in black ink, appearing to read "Salvador Delgado".

CC: Natasha Oeltjen, AUSA